

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

BILAL MOHAMMAD SIDDIQUI,

Defendant.

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CRIMINAL NO. CCB-19-0322

CONSENT MOTION FOR RESTITUTION AND ENTRY OF AMENDED JUDGMENT

The United States of America, with the consent of the Defendant, Bilal Mohammad Siddiqui, hereby moves for an Order of Restitution in the amount of \$3,000 and entry of an Amended Judgment incorporating the restitution order. In support of the motion, the government states as follows:

1. On October 18, 2019, the Defendant pleaded guilty to a three-count information charging him, in Counts One and Two, with sexual exploitation of minors, in violation of 18 U.S.C. § 2251(a); and, in Count Three, with cyberstalking, in violation of 18 U.S.C. § 2261A(2)(B). *See* ECF 36. The Defendant entered his guilty plea pursuant to an agreement with the government in which the Defendant acknowledged that the victims of these offenses are entitled to mandatory restitution under 18 U.S.C. §§ 3663A and 3771. *See* ECF 38 ¶ 14.

2. The Defendant was sentenced on October 29, 2020, and the Court entered its Judgment on November 2, 2020. *See* ECF 65. The Judgment ordered the Defendant to pay a special assessment of \$300 but deferred the determination of restitution for 90 days. *See id.*

3. On January 20, 2021, the government filed a status report indicating that the parties were negotiating a possible agreement concerning restitution. *See* ECF 80. The Court approved

the report and requested that the parties report further on the status of restitution by February 1, 2021. *See* ECF 81.

4. On February 1, 2021, the government filed a second status report indicating that the parties had continued to discuss the matter but had been unable to formalize an agreement concerning restitution because the Defendant had been designated to a Bureau of Prisons facility during the interim. *See* ECF 82. The Court approved the report and requested that the parties report further on the status of restitution by February 16, 2021. *See* ECF 83.

5. On February 16, 2021, the defense filed a letter on behalf of both parties requesting an extension of time to report on the status of restitution because the Defendant had been quarantined upon his arrival at the BOP facility, FCI Allenwood. *See* ECF 84. The Court granted the request and requested that the parties report further on the status of restitution by March 2, 2021. *See* ECF 85.

6. On March 2, 2021, the government filed a third status report indicating that the parties had reached an agreement by which the Defendant would pay the \$300 special assessment and an agreed-upon amount of restitution to victim Jane Doe 1,¹ the only victim to have submitted a restitution request, in the form of a check to be delivered to the Clerk of Court on or before March 29, 2021.² *See* ECF 88. The government further indicated that, within 30 days of the delivery of the check, or notification that the check had cleared (whichever was earlier), the government would file a consent motion for a restitution order in the amount of the Defendant's payment (less the

¹ Because Jane Doe 1 is a minor, the payment would be directed to Jane Doe 1's mother, who is Jane Doe 1's legal guardian.

² Under 18 U.S.C. 3612(c), any payment made by the Defendant would first be applied to the special assessment before being applied to any restitution obligation.

special assessment) and the entry of an Amended Judgment. *See id.* The Court approved the request and requested a further status report on or before April 28, 2021. *See* ECF 89.

7. The United States hereby reports that the parties have agreed to restitution to Jane Doe 1 in the amount of \$3,000.³ On March 24, 2021, the Clerk of Court confirmed to undersigned counsel for the government that it had received a payment on the Defendant's behalf in the form of a \$3,300 Bank of America cashier's check—representing the \$3,000 restitution payment and the \$300 special assessment.

8. Accordingly, the government moves the Court, with the Defendant's consent, to enter a restitution order in the amount of \$3,000 and to amend its Judgment in this case to reflect the restitution order. A proposed Order of Restitution is attached hereto for the Court's convenience. Once ordered, the Clerk of Court will apply the Defendant's payment to the Court's restitution order, causing the restitution payment to be paid to Jane Doe 1, thereby fully satisfying all of the Defendant's criminal penalties in this case.

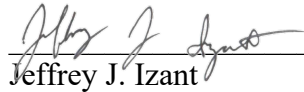
9. Finally, the government requests that Jane Doe 1's identifying information—which is attached to this Consent Motion as **Exhibit A** (filed under seal) and is necessary for the Clerk of Court to distribute the restitution payment—be included (either in substance or by reference) in the sealed Statement of Reasons that accompanies the forthcoming Amended Judgment, and that the Clerk of Court be instructed to distribute restitution in accordance with that information.

³ The mother of Jane Doe 1 has also agreed to restitution in this amount.

10. All other conditions and terms of the original Judgment should remain the same.

Respectfully submitted,

Jonathan F. Lenzner
Acting United States Attorney

By: 

Jeffrey J. Izant
Assistant United States Attorney